



U.S. Department of Justice

United States Attorney  
Southern District of New York

50 Main Street, Suite 1100  
White Plains, New York 10606

May 2, 2023

Hon. Kenneth M. Karas  
United States District Judge  
300 Quarropas Street  
White Plains, NY 10601

**Re: *United States v. Joseph Mori*, 20 Cr. 100 (KMK)**

Dear Judge Karas:

The Government writes to request respectfully that the docket and all filed documents in the above case be unsealed, with the exception of the sentencing memoranda filed by the parties and Schedule A to the restitution order.

The docket in this case was originally sealed because the defendant intended to cooperate. While the defendant attempted to cooperate, his efforts did not justify the filing of a motion for a downward departure pursuant to U.S.S.G. § 5K1.1. Both parties did, however, describe the defendant's attempts to cooperate in their respective sentencing memoranda.

The Probation Office recently advised me that the judgment, restitution order and forfeiture order remain under seal, which is complicating its efforts to collect restitution. Since there is no longer any need to maintain the entire docket and all filings under seal, the Government respectfully requests that the docket and all filed documents be unsealed, except for the defendant's sentencing memorandum of January 7, 2022; the Government's sentencing memorandum of March 16, 2022; and Schedule A to the restitution order, which identifies the victims in the case. //

Granted -  
So Ordered,  
MAK  
2/3/25

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

/s

By:

James McMahon  
Assistant United States Attorney  
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cc: Gordon Mehler, Esq. (by email)  
Norman Kaplan, Esq. (by email)